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President's Council on Food Safety

Public Comment

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My name is Paula J. Copalello,

I am speaking on behalf of those affected with latex allergy and those who are unaware that latex allergy is a problem in food handling.

One of the issues concerning food safety is the problem of latex gloves contaminating food. The idea that latex gloves could contaminate food seems strong but a serious and new disease has developed as a result of latex gloves. The disease is latex allergy which causes a range of symptoms from ~~hayfever~~ type symptoms to asthma to anaphylactic shock and death. Latex allergy is prevalent in many groups of individuals. Patients with ~~spina~~ bifida and congenitourinary abnormalities have a prevalence of latex sensitization of 18-73%. In health care workers it is 3-17%. Atopic patients 6.8%. In patients who have undergone multiple procedures it is 6.5% (Sussman, 1996) and findings now show that 1-6% of the general population may be affected with latex allergy.

For those who are not familiar with latex, I am referring to Natural Rubber Latex (NRL). This is a substance obtained ~~from~~ the rubber tree to make products like latex gloves. There are many allergy producing proteins in latex products that are manufactured with latex. These proteins are shed from the surface of the gloves and cause the allergy in the person that wears the gloves. However, the important point that we are here to make today is the fact that the allergy producing proteins in latex gloves transfer onto foods, dishes and other surfaces and can produce life threatening allergic reactions in persons with latex allergy who consume those foods. The transfer of allergenic proteins from latex gloves to foods is well documented in laboratory research

and the resulting severe allergic reactions among people who consume these foods is documented in clinical reports.

We know that food handlers are wearing gloves to prevent contamination of food with harmful organisms but they are unaware of the hazards of wearing latex gloves to themselves and the persons eating the foods.

The National Institute of Occupational Safety and Health (NIOSH) has recommended that latex gloves should not be worn by food handlers. This is the position of the American Nurses Association (ANA), the Illinois Nurses Association (INA), the American Academy of Allergy, Asthma and Immunology (AAAAI), the American College of Allergy, Asthma and Immunology (ACAAI) and the National Institute of Occupational Safety and Health (NIOSH).

In the interest of the safety of latex allergic children and adults with latex allergy and for the sake of preventing reactions to those who could suffer potentially life-threatening reactions from food prepared by workers wearing latex gloves, we are requesting you to take action and follow the recommendations of the National Institute of Occupational Safety and Health (NIOSH) to stop the use of latex gloves among food handlers.

Thank you,

Paula J. Copalello, RN

Reference

Sussman, Gordon, M.D., Gold, Milton, M.D. *Guidelines for the Management of Latex Allergies and Safe Latex Use in Health Care Facilities*. March 1996, p. 6.

AAAAI and ACAAI joint Statement Concerning the Use of Powdered and Non-powdered Natural Rubber Latex Gloves

This statement was developed by a joint subcommittee of the American College of Allergy, Asthma and Immunology (AAAAI) and the American Academy of Allergy, Asthma and Immunology (AA&U). It was approved by the ACAAI Board Of Regents on the recommendation of the Executive Committee On July 21, 1997.

IgE-mediated latex allergy is the result of chronic exposure of susceptible individuals to latex rubber proteins. Medical devices - principally latex gloves - are the largest single source of exposure to these potent allergens. Exposure to bioavailable allergen may be by direct contact with an offending device or by inhalation of allergen carried by cornstarch powder with which most powdered gloves are coated.¹⁴ The clinical manifestations of latex allergy range from mild contact urticaria to fatal anaphylaxis.

Allergensensitization to constituent latex rubber proteins is linked to exposure to latex allergens in the vast majority of cases. Direct exposure to latex allergens results from either contact exposures to medical devices and latex gloves¹⁴ or from respiratory exposure to latex aeroallergen carried by donning glove powders.¹⁴

Latex occupational asthma may result from inhalation of latex rubber proteins carried on glove powder from latex gloves.¹⁴ Asthma caused by occupational exposure may continue and lead to persistent impairment, and rarely, to disability.⁷

These risks - of acute allergic reactions and of occupational asthma - can be reduced only by curtailing expo-

sure to latex rubber proteins.^{10,11} We recommend that the following steps, which utilize currently available devices, be taken to reduce these risks:

- Latex gloves should be used only as mandated by accepted Universal Precautions standards. The routine use of latex gloves by food handlers, housekeeping, transport and medical personnel in low risk situations (e.g. food handling, bed transport, routine physical examination) should be discouraged.
- Only low-allergen latex gloves should be purchased and used. This will reduce the occurrence of reactions among sensitized personnel and should reduce the rate of sensitization.^{12,13}
- Only powder-free latex gloves should be purchased and used. This will reduce latex rubber aeroallergen levels and exposure.¹⁵⁻¹⁷

AAAAI American College
of Allergy, Asthma
& Immunology

References

1. Slater J. Latex Allergy. *J Allergy Clin Immunol* 1994;94:139-49.
2. Charous S, Hamilton R, Yunginger J. Occupational latex exposure: characteristics of contact and systemic reactions in 47 workers. *J Allergy Clin Immunol* 1994;94(1):12-18.
3. Sussman G, Beezhold D. Allergy to latex rubber. *Am J Med* 1995;122(1):43-46.
4. Beezhold D, Beck W. Surgical glove powders bind latex antigens. *Archives of Surgery* 1992;127: 1X4-57.
5. Tomazic V, Champagne E, Lamanna A, et al. Cornstarch powder on latex products is an allergen carrier. *J Allergy Clin Immunol* 1994;93(4):751-8.
6. Swanson M, Bubak M, Hunt L, et al. Quantification of occupational latex aeroallergens in 3 medical centers. *J Allergy Clin Immunol* 1994;94:445-551.
7. Swanson M, Yunginger J, Reed C. Immunochemical quantification of airborne natural rubber allergens in medical and dental office buildings. In: Maroni M, ed. Ventilation and indoor air quality in hospitals. 1996:257-62.
8. Heilman D, Jones R, Swanson M, et al. A prospective, controlled study showing that rubber gloves are the major contributor to latex aeroallergen levels in the operating room. *J Allergy Clin Immunol* 1996;98:325-30.
9. Paggiaro P, Vagaggini B, Bacci E, et al. Prognosis of occupational asthma. *Eur Respir J* 1994;7:761-67.
10. Charous S, Banov C, Bardana EJ, et al. Latex allergy - an emerging healthcare problem. *Ann Allergy Asthma Immunol* 1995;75:19-21.
11. Kelly K, Sussman G, Fink J. Stop the sensitization. *J Allergy Clin Immunol* 1996;98:857-858.
12. Jones R, Scheppmann D, Heilman D, et al. Prospective study of extractable latex allergen contents of disposable medical gloves. *Am J Allergy* 1994;73(4):321-25.
13. Patterson P. Allergy issues complicate buying decisions for gloves. *OR Manager* 1995;11(6).
14. Yunginger J, Jones R, Fransway A, et al. Extractable latex allergens and proteins in disposable medical gloves and other rubber products. *J Allergy Clin Immunol* 1994;93:336-42.
15. Tarlo S, Sussman G, Contata A, et al. Control of airborne latex by use of powder-free gloves. *J Allergy Clin Immunol* 1994;93:985-9.
16. Vandenas O, Delwiche J-P, Depelchin S, et al. Latex gloves with a lower protein content reduce bronchial reactions in subjects with occupational asthma caused by latex. *Am J Respir Crit Care Med* 1995;151:887-891.
17. Siu S, Smith G, Sussman G, et al. Reduction of airborne latex protein exposure by use of low protein, powder-free gloves. *J Allergy Clin Immunol* 1996;97:325.

Preventing Latex Allergy

Q. How can *latex allergy* be prevented?

- A. All products and medical devices that come in contact with individuals at risk should be reviewed for possible **latex content**. A label of "**hypoallergenic**" **does not** mean that a product is latex-free.

In general, only low allergen, preferably non-powdered latex gloves should be used. The powders that are used in some latex gloves can absorb latex proteins and carry them into the air where they may be inhaled by latex-sensitive individuals.

Q. How can health care workers who must wear rubber gloves to protect themselves from transmissible disease protect themselves from developing *latex* hypersensitivity?

- A. Health care workers with a history of latex sensitivity must stop wearing latex gloves and their co-workers must not use powdered gloves. Care should be exercised in the choice of substitutes, since all synthetic or non-latex products are not equally impermeable to blood-borne pathogens.

Health care workers with a history of glove-associated skin irritations, or **contact dermatitis**, should use alternative gloves (which may include latex gloves) and topical treatments to relieve their symptoms. Some petroleum-based products have been shown to compromise the barrier function of latex gloves, and care should be taken in the choice of treatments used to relieve **contact dermatitis**.

Q. What can be done to protect against latex allergy?

- A. The FDA in June 1986 proposed mandatory labeling of latex rubber in medical devices and banning of the term "hypoallergenic" on latex-containing medical devices, requirements that have been urged by the American College of Allergy, Asthma & Immunology. The College also has proposed that the FDA and other government agencies:

establish maximum levels of extractable latex allergen in gloves

- "fast track" the approval process of diagnostic tests for latex allergy

- conduct or fund epidemiologic studies to identify causes of latex allergy and minimize risk factors
- address issues of patient-worker safety in the medical setting
- consider content labeling for consumer products that contain latex rubber

Diagnosis and Treatment

Q. How is a suspected latex allergy confirmed?

- A. A skin prick test may be done to test for latex allergy, but there are currently no licensed reagents commercially available for the test. Because of the potential for a life-threatening anaphylactic reaction to the test itself, skin prick tests for latex allergy should be performed only under the close supervision of an allergy specialist. An allergist-immunologist also can perform a blood test to confirm the presence of IgE anti-latex antibodies. Skin patch tests are used to evaluate the cause of skin irritations, or contact dermatitis, caused by rubber gloves.

Q. How are latex allergies treated?

- A. There are a number of medications available to treat the symptoms of latex allergy once it develops. However, because there is no cure yet, the best "treatment" is prevention. An allergy specialist can provide more information on how to manage allergic reactions to latex.



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Q&A: Latex Allergies

The incidence of serious allergic reactions to latex has increased dramatically in recent years. In rare cases, these allergies can be fatal. Health care workers and others who are frequently exposed to products containing latex should be aware of the potential for developing an allergic reaction, and individuals who exhibit symptoms of the allergy should be alerted to the need to avoid future exposure to latex products.

About Latex Allergy

Q. What is latex allergy?

- A. Latex allergy, or hypersensitivity, occurs when the body's immune system reacts to proteins found in natural rubber latex. The immune system launches a "defense" that can cause a host of unpleasant and, in some cases, life-threatening symptoms. It is the same type of generalized allergic reaction seen when individuals who are allergic to bee venom receive a bee sting.

Q. What triggers the immune system's reaction to latex?

- A. Some individuals have specific antibodies, called IgE antibodies, that make them hypersensitive to the proteins in natural rubber latex. IgE-mediated reactions to latex proteins are responsible for most and for the most severe allergic reactions to latex. Also, various chemicals that are added to latex during processing may be responsible for some local skin reactions, but these additives have not been implicated in the more generalized, potentially fatal allergic reactions associated with latex.

About Natural Rubber Latex

Q. What is natural rubber latex?

- A. Natural rubber latex is a processed plant product derived almost **exclusively** from the tree *Hevea brasiliensis* found in Africa and Southeast Asia. Natural rubber latex should not be confused with butyl- or petroleum-based synthetic rubbers. Synthetic products, including latex house paints, have not been shown to pose any hazard to latex-sensitive individuals.

Q. What products contain latex?

- A. Latex is a common component of many medical supplies, including **disposable** gloves, airway and intravenous tubing, syringes, stethoscopes, catheters, dressings and bandages. Many of these medical devices come into contact with mucous membranes, which enhances the absorption of latex proteins that can trigger an allergic reaction. **Latex** gloves also frequently are **implicated in allergic reactions due to the repeated direct exposure of the wearer's hands to latex proteins or due to airborne latex proteins that are absorbed by powders used to line some latex gloves.**

While latex also is found in as many as 40,000 consumer products, including condoms, balloons, athletic shoe soles, tins, underwear leg and waist bands, rubber toys, nipples and pacifiers, these rarely cause problems except in the most sensitive patients.

Symptoms of Latex Allergy

Q. What are the symptoms of latex allergy?

- A. Allergy to latex proteins is a new medical problem with symptoms similar to those seen in individuals who are allergic to bee venom or cat dander. Reactions on exposure to the allergen are **generally** acute and may mimic hay fever or asthma, with symptoms such as nasal congestion, hives or **difficulty** breathing. The most severe cases can result in anaphylaxis, a **potentially** fatal reaction that affects many parts of the body at once. Symptoms are usually immediate, progress rapidly and may include a dangerous drop in blood pressure, flushed skin,

difficulty breathing, **swelling** of the throat, **tongue** and nose, and loss of consciousness. **Emergency** medical attention should be sought at the first sign of an anaphylactic reaction.

Skin problems resulting from the use of latex and non-latex **gloves** are frequently confused with latex allergy. Contact dermatitis is a frequent problem in glove wearers which can be due to an irritant contact dermatitis caused by frequent hand-washing and drying with irritating soaps, skin abrasions from donning and removing gloves and maceration of skin covered by an impermeable barrier. It can also be due to a "chemical sensitivity" dermatitis caused by a contact allergy to one of the chemicals used in the production of rubber gloves. These local skin problems are **virtually** never a result of true latex allergy.

Q. How do the symptoms develop?

- A. In most cases, latex allergy develops after repeated **exposures** to latex. It should be noted, however, that direct physical contact with latex-containing products is not needed to trigger the **allergic reaction**. Cases of anaphylaxis have resulted from inhaling latex proteins, which can be absorbed by the powder that is used to line some latex gloves. When the gloves are snapped on and off, the proteins become airborne and can pose a risk to some individuals with latex hypersensitivity.

Prevalence of Latex Allergy

Q. How common is latex allergy?

- A. It is difficult to say how widespread the problem of latex allergy may be. Approximately 1,000 cases of allergic or anaphylactic reactions to latex-containing medical products have been reported in the U.S. Food and Drug Administration (FDA) since 1988. It is assumed that many other cases go unreported. In one 1994 study, 6 percent of volunteer blood donors were found to have increased levels of anti-latex IgE antibodies, although many of the volunteers did not show symptoms of latex allergy. **Other research suggests that more than 100,000 health care workers** may be at risk for developing latex allergy.

Q. Why is the incidence of latex allergy increasing?

- A. The introduction of **universal** precautions in health care settings including the widespread use of latex gloves to prevent the spread of AIDS and **hepatitis B** is believed to be the primary cause of the increased prevalence of latex allergy. Also, there is greater awareness and reporting of latex allergy than in the past.

Individuals at Risk

Q. Who is at greatest risk for latex allergy?

- A. The greatest risk is to individuals who are repeatedly **exposed** to products containing latex, particularly:

Patients with a history of early and/or **recurrent** surgical or medical procedures, such as children with spinal bifida.

Health care personnel and **others** who wear latex gloves.

Individuals with occupational **exposure**, such as workers **involved** in the **manufacture** of latex gloves or catheters.

Other risk factors are less defined but appear to include:

A history of hay fever or other allergic problems.

A history of food allergies to tropical fruits, hazelnuts, chestnuts or stone fruits, particularly if progressive in scope or severity.

Hand **dermatitis** that is severe or has changed in severity in an individual who wears latex gloves.

Q. Who is most at risk of developing a life-threatening anaphylactic reaction to latex?

- A. The risk of anaphylaxis appears to be greatest in individuals with prior **allergic** reactions to latex-containing objects or prior, unexplained reactions or anaphylaxis during a medical or surgical procedure. Health care providers with a history of severe or **worsening** latex-glove-induced eczema, hives or work-related rhinitis or asthma-like symptoms should be especially cautious.